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10 UNITED STATES DISTRICT COURT
11 EASTERN DISTRICT OF WASHINGTON

12 NATIONAL SHOOTING SPORTS
13 FOUNDATION,

14 Plaintiff,

15 v.

16 ROBERT W. FERGUSON,
17 ATTORNEY GENERAL OF THE
18 STATE OF WASHINGTON,

19 Defendant.
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No. 2:23-cv-00113-MKD

DECLARATION OF HIEDI LEE
ON BEHALF OF MINUTEMAN
AMMUNITION

CERTIFICATE OF SERVICE

I hereby certify that on (Date), I electronically filed the foregoing with the Clerk of the Court using the CM/ECF System, which in turn automatically generated a Notice of Electronic Filing (NEF) to all parties in the case who are registered users of the CM/ECF system. The NEF for the foregoing specifically identifies recipients of electronic notice.

DATED at Seattle, Washington on 4th day of May, 2023.

s/ Megan Johnston

Megan Johnston, Legal Assistant

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DECLARATION OF HIEDI LEE

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Declaration of Hiedi Lee on behalf of Minuteman Ammunition

I, Hiedi Lee, hereby declare as follows.

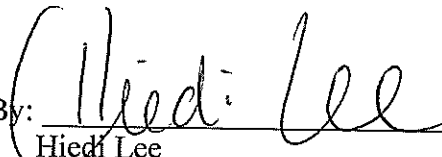
1. I am over the age of 18 years, and I am qualified to submit this declaration on behalf of Minuteman Ammunition (“Minuteman”).
2. I have personal knowledge of the facts set forth in this declaration through direct involvement and by personally reviewing Minuteman’s records and information.
3. I am the co-owner of Minuteman.
4. Minuteman is a member of the National Shooting Sports Foundation.
5. Minuteman is a S corporation with its principal place of business in Washougal, Washington. Minuteman presently conducts all of its manufacturing operations in Washington.
6. Minuteman is authorized by law to manufacture and sell ammunition as a Federal Firearms Licensee (FFL 06) licensed by the Bureau of Alcohol, Tobacco, Firearms and Explosives.
7. Because Minuteman is “engaged in the ... manufacturing” of “ammunition” that is “used or possessed in [Washington],” Minuteman is a “firearm industry member” as that term is used Washington Senate Bill 5078 (“SB 5078”). Minuteman is also a “manufacturer” as that term is defined in the federal Protection of Lawful Commerce in Arms Act (“PLCAA”).
8. We make premium quality, self defense and hunting ammunition
9. We sell ammunition to law enforcement officer, military members, and training professionals for duty, recreational and training purposes.
10. We market our product to the lawful firearm user. After sale and delivery, we cannot control whom has access to our products. We market our products for some unique applications and unique marketing styles, methods, including the Werewolf Defense products and Canned Ammo. We fear that our first amendment rights will be restricted, or found to establish

our brand as a public nuisance. We fear that the illegal use of our product, through no fault of our own, could apply liability for that unlawful or irresponsible use of our product.

11. Absent an injunction preventing SB 5078 from being applied against Minuteman, Minuteman will suffer irreparable harm.

I declare under penalty of perjury that the foregoing is true and correct.

Executed this 14th day of April, 2023.

By: 
Hiedi Lee